



FILE COPY

Office of General Counsel

JUN 9 2017

MEMORANDUM FOR RICHARD BECKLER
GENERAL COUNSEL (L)

FROM: (b)(6)
EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as General Counsel, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated May 23, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organizations in which you are negotiating for employment. I note that a review of your report showed that you have interest in (b)(6) a company that could be affected by actions of this agency. This means that if a matter comes before you that would affect the financial interests of this company, or any of your other financial interests, you must notify your supervisor promptly and refrain from participating in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Outside Earned Income Limitations

As a covered noncareer employee you are subject to the outside earned income limitations and employment and affiliation restrictions. 5 C.F.R. § 2636.300 et seq. *Outside earned income and compensation* both mean wages, salaries, honoraria, commissions, professional fees and any other form of compensation for services other than salary, benefits and allowances paid by the United States Government. Accordingly, you may not, in any calendar year, receive outside earned income which exceeds 15 percent of the annual rate of basic pay for level II of the Executive Schedule. 5 C.F.R. § 2636.304. The amount for 2017 is \$27,765.00.

Additionally, as a covered noncareer employee, you are prohibited from receiving compensation for practicing a profession which involves a fiduciary relationship; or affiliating with or being employed to perform professional duties by a firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship; or permit your name to be used by any firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship. 5 C.F.R. § 2636.305. You are also prohibited from receiving compensation for serving as an officer or member of the board of any association, corporation, or other entity. 5 C.F.R. § 2636.306. Please note that this regulation does not prohibit uncompensated service with any entity as an officer or member of the board.

Lastly, you are reminded that should you choose to engage in teaching for compensation, you must receive advance authorization. 5 C.F.R. § 2636.307.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment.

The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. §§ 203 and 205. Section 203, precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with Bracewell LLP in May of 2017. Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect Bracewell LLP until May 1, 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note, as stated above, that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until May 1, 2019. Should a matter come before you that may affect Bracewell LLP, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that should you choose to engage in outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the

endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702. You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may

choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Shana Vinson at (202) 501-9103 or the Ethics Law Staff at (202) 501-0765.

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MAY 18 2017

MEMORANDUM FOR BRIDGET BRENNAN
SENIOR ADVISOR FOR ADMINISTRATIVE SERVICES
OFFICE OF CHIEF COUNSEL (AC)

(b)(6)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of Public Financial Disclosure Report
(OGE Form 278e) – Transferee

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor, file a Public Financial Disclosure Report. As a transferee in an OGE Form 278e filing position from the Department of Treasury ("Treasury") you submitted a copy of your 2017 report, originally filed with Treasury, to GSA for review. Your Public Financial Disclosure Report dated February 16, 2017 has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiation for employment. A review of your OGE Form 278e report revealed that you have a financial in a company that could be affected by actions of this agency. If a matter comes before you that could affect the financial interests of your assets, you must promptly notify your supervisor and refrain from participating in the matter until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Impartiality in the Performance of Your Official Duties

Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year, unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Should a matter come before you that may affect a person or entity you have a covered relationship with, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30

days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's, and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Shana Vinson at (202) 501-9103 or the Ethics Law Staff at (202) 501-0765.

cc: Jack St. John, Chief of Staff

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FILE COPY

Office of General Counsel

JUN 9 2017

MEMORANDUM FOR COREY COOKE

SENIOR ADVISOR FOR TECHNOLOGY
OFFICE OF THE ADMINISTRATOR (AC)

FROM:

(b)(6)

EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT:

Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor for Technology, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated May 12, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor and promptly refrain from participating in the matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

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1800 F Street, NW
Washington, DC 20405
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substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. §§ 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year, unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Should a matter come before you that may affect a person or entity you have a covered relationship with, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's, and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

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FILE

Office of General Counsel

MEMORANDUM FOR MICHAEL DOWNING
SENIOR ADVISOR
OFFICE OF THE CHIEF OF STAFF (AC)

FROM: EUGENIA D. ELLISON EUGENIA ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

Digitally signed by EUGENIA ELLISON
DN: cn=U.S. Government, ou=General
Services Administration, cn=EUGENIA ELLISON,
o=U.S. Government, ou=U.S. Government,
c=US, email=EUGENIA.ELLISON@GSA.GOV,
Date: 2017.03.10 11:15:12 -0500

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated February 1, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor promptly and recuse yourself from participation in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

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Washington, DC 20405
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substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. According to your report, your former employer was the Republican Party of Pennsylvania. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

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Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with the Republican Party of Pennsylvania in January 2017. Under the impartiality regulation, 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect the Republican Party of Pennsylvania until or about January 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until January 20, 2019. Should a matter come before you that may affect the Republican Party of Pennsylvania,

you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

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If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

cc: Jack St. John, Senior White House Advisor

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Office of General Counsel

MEMORANDUM FOR BRENNAN HART
SENIOR ADVISOR
OFFICE OF THE ADMINISTRATOR (A)
EUGENIA
FROM: EUGENIA D. ELLISON ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)
SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

Digitally signed by EUGENIA ELLISON
DN: cn=EUGENIA ELLISON, ou=General
Services Administration, o=GSA
6 9 2342 18200 800 100 1 1-4700-000010000
Date: 2017.03.10 11:17:31 -0500

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated February 1, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor promptly and recuse yourself from participation in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

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substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. According to your report, your former employer was Three Rivers Solutions, LLC. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with Three Rivers Solutions, LLC in January 2016. Under the impartiality regulation, 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect Three Rivers Solutions, LLC until or about January 2017; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until January 20, 2019. Should a matter come before you that may affect Three Rivers Solutions, LLC, you must notify your supervisor

promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report,

similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

cc: Jack St. John, Senior White House Advisor

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MAR 14 2017

MEMORANDUM FOR JACK ST. JOHN
SENIOR WHITE HOUSE ADVISOR
OFFICE OF THE CHIEF OF STAFF (AC)

FROM: BRENNAN HART (b)(6)
SENIOR ADVISOR (AS)
OFFICE OF THE ADMINISTRATOR

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of January 20, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, the Three Rivers Solutions, LLC.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, I recommend that all matters involving the above entitled companies that would normally come before me be referred to Emily Murphy, White House Liaison, unless you object. Ms. Murphy will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Emily Murphy, White House Liaison;
Ethics Law Staff



FILE COPY

Office of General Counsel

JUN 20 2017

MEMORANDUM FOR JESSICA JENNINGS
SPECIAL ASSISTANT
OFFICE OF CONGRESSIONAL AND
INTERGOVERNMENTAL AFFAIRS (S)

(b)(6)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Special Assistant, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated June 9, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor and promptly refrain from participating in the matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under

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paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. According to your report, your former employer was Van Scoyoc Associates. Your former clients include, but are not limited to the following companies: Austal USA and the Coalition of EPSCoR States. Additionally, there are clients whose names were not reported on your Public Financial Disclosure Report because they fell below the required reporting threshold as required by Part 4, Filer's Sources of Compensation Exceeding \$5,000 in a Year. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Your recusal under the Ethics Pledge will be in effect for two years from the date of your appointment. Further, because you were a registered lobbyist within the two years before the date of your appointment, in addition to abiding by the limitations of paragraph 6 of the Ethics Pledge, you must not for a period of two years after the date of your appointment participate in any particular matter on which you lobbied within the two years before the date of your appointment or participate in the specific issue area in which that particular matter fits.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Attached to this memorandum is your recusal notification for review and signature. Please sign and submit a copy to your supervisor, Mr. Brennan Hart, Associate Administrator for Congressional and Intergovernmental Affairs, as well as the parties cc'd on the document.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial

interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with Van Scoyoc Associates in May 2017. Under the impartiality regulation, 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect Van Scoyoc Associates until or about May 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until May 18, 2019. Should a matter come before you that may affect Van Scoyoc Associates, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

Attachment

cc: Brennan Hart, Associate Administrator for Congressional & Intergovernmental Affairs

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Office of General Counsel

**MEMORANDUM FOR BRENNAN HART
ASSOCIATE ADMINISTRATOR FOR
CONGRESSIONAL & INTERGOVERNMENTAL AFFAIRS (S)**

FROM: JESSICA JENNINGS
SPECIAL ASSISTANT
OFFICE OF CONGRESSIONAL AND
INTERGOVERNMENTAL AFFAIRS (S)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of May 18, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer or former clients. Further, because I was a registered lobbyist within the two years before the date of my appointment, in addition to abiding by the limitations of paragraph 6 of the Ethics Pledge, I will not for a period of two years after the date of my appointment participate in any particular matter on which I lobbied within the two years before the date of my appointment or participate in the specific issue area in which that particular matter fits.

My former employer is Van Scoyoc Associates. My former clients include, but are not limited to the following companies: Austal USA and the Coalition of EPSCoR States. Additionally, there are clients whose names were not reported on my Public Financial Disclosure Report because they fell below the required reporting threshold as required by Part 4, Filer's Sources of Compensation Exceeding \$5,000 in a Year. Accordingly, I will notify you of my recusal obligation if a matter before me involves an unidentified former client.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

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To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the refusal.

(b)(6)

cc: Ethics Law Staff



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Office of General Counsel

SEP 11 2017

MEMORANDUM FOR BENJAMIN KENNEY
ASSOCIATE ADMINISTRATOR
OFFICE OF STRATEGIC COMMUNICATIONS (Z)

(b)(6)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position as Associate Administrator for the Office of Strategic Communications, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated July 28, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor and promptly refrain from participating in the matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

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substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

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As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year, unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Should a matter come before you that may affect a person or entity you have a covered relationship with, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

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If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

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Office of General Counsel

JUL 10 2017

MEMORANDUM FOR JEFFREY LEIERITZ

SENIOR COMMUNICATIONS ADVISOR
OFFICE OF STRATEGIC COMMUNICATIONS (Z)

(b)(6)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position as Senior Communications Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated June 30, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor and promptly refrain from participating in the matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

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Washington, DC 20425

8276 GSA Q-1

substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. According to your report, your former employer is Associated Builders and Contractors. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Attached to this memorandum is your recusal notification for review and signature. Please sign and submit a copy to your supervisor, Mr. Ben Kenney, Associate Administrator for Strategic Communications, as well as the parties cc'd on the document.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with the Associated Builders and Contractors in June 2017. Under the impartiality regulation, 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect the

Associated Builders and Contractors until or about June 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until June 5, 2019. Should a matter come before you that may affect the Associated Builders and Contractors, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

Attachment

cc: Associate Administrator for Strategic Communications

RESTRICTED DISTRIBUTION -- FOR ADDRESSEE'S EYES ONLY



MEMORANDUM FOR BEN KENNEY
ASSOCIATE ADMINISTRATOR FOR
STRATEGIC COMMUNICATIONS (Z)

FROM: JEFFREY LEIERITZ
SENIOR COMMUNICATIONS ADVISOR
OFFICE OF STRATEGIC COMMUNICATIONS (Z)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 5, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, the Associated Builders and Contractors.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

(b)(6)

1/12/2017



FILE COPY

Office of General Counsel

AUG 14 2017

MEMORANDUM FOR CHARLES MANGER
ASSOCIATE ADMINISTRATOR FOR
SMALL BUSINESS UTILIZATION (E)

(b)(6)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Associate Administrator for Small Business Utilization, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated June 21, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organizations in which you are negotiating for employment. I note that a review of your report showed that you have interest in (b)(6)

companies that could be affected by actions of this agency. If a matter comes before you that would affect the financial interests of these companies, or any of your other financial interests, you must notify your supervisor promptly and refrain from participating in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Outside Earned Income Limitations

As a covered noncareer employee you are subject to the outside earned income limitations and employment and affiliation restrictions. 5 C.F.R. § 2636.300 et seq. *Outside earned income and compensation* both mean wages, salaries, honoraria, commissions, professional fees and any other form of compensation for services other than salary, benefits and allowances paid by the United States Government. Accordingly, you may not, in any calendar year, receive outside earned income which exceeds 15 percent of the annual rate of basic pay for level II of the Executive Schedule. 5 C.F.R. § 2636.304. The amount for 2017 is \$27,765.00. Please note that for your first year of appointment this amount is prorated based on the remaining days in the calendar year.

Additionally, as a covered noncareer employee, you are prohibited from receiving compensation for practicing a profession which involves a fiduciary relationship; or affiliating with or being employed to perform professional duties by a firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship; or permit your name to be used by any firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship. 5 C.F.R. § 2636.305. You are also prohibited from receiving compensation for serving as an officer or member of the board of any association, corporation, or other entity. 5 C.F.R. § 2636.306. Please note that this regulation does not prohibit uncompensated service with any entity as an officer or member of the board.

Lastly, you are reminded that should you choose to engage in teaching for compensation, you must receive advance authorization. 5 C.F.R. § 2636.307.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment.

The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. §§ 203 and 205. Section 203, precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with UBS Financial Services in May of 2017. Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect UBS Financial Services until May of 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note, as stated above, that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until May of 2019. Should a matter come before you that may affect UBS Financial Services, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that should you choose to engage in outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)).

Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702. You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may

choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Shana Vinson at (202) 501-9103 or the Ethics Law Staff at (202) 501-0765.

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Office of General Counsel

MEMORANDUM FOR EMILY MCBRIDE
SPECIAL ASSISTANT (A)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL
FOR GENERAL LAW/ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

EUGENIA
ELLISON

Digitally signed by EUGENIA ELLISON
DN: cn=US, o=U.S. Government, ou=General
Services Administration, cn=EUGENIA
ELLISON,
D 9 2342 19200300.100.1.1=47001000010095
Date: 2017.04.05 14:35:39 -0400

SUBJECT: Review of Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires you to file a Public Financial Disclosure Report due to your position as a Special Assistant. I have reviewed your OGE Form 278e dated March 22, 2017, and determined it does not reveal any real or apparent conflicts of interest between your financial interests and official duties.

You may access, view, and print a copy of your certified financial disclosure report at any time through the Integrity system. <https://integrity.gov>.

If you have any questions, please contact the Ethics Law Staff at (202) 501-0765.

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Washington, DC 20405
www.gsa.gov



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Office of General Counsel

MEMORANDUM FOR EMILY MURPHY
WHITE HOUSE LIAISON (AC)

FROM: EUGENIA D. ELLISON EUGENIA
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

Digitally signed by EUGENIA ELLISON
DN: cn=EUGENIA ELLISON, o=U.S. General Services Administration, email=EUGENIA.ELLISON@GSA.GOV
Date: 2017.03.10 12:19:06 -0500

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as White House Liaison, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated February 21, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. A review of your New Entrant OGE Form 278e report revealed that you have a financial interest in the following real estate securities sector funds: (b)(6); as well as a number of (b)(6)

At this time, it is not necessary for you to divest your interests in the above (b)(6) because the likelihood that your duties will involve any particular matter that would knowingly have a direct and predictable effect on the financial interests of the (b)(6) you hold is remote. However, please note that should a matter come before you that may affect the

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underline holdings of the above (b)(6)

you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff. For your reference, I have attached the 2016 listing of the underline holdings for the sector funds listed above.

Outside Earned Income Limitations

As a covered noncareer employee you are subject to the outside earned income limitations and employment and affiliation restrictions. 5 C.F.R. § 2636.300 et seq. *Outside earned income and compensation* both mean wages, salaries, honoraria, commissions, professional fees and any other form of compensation for services other than salary, benefits and allowances paid by the United States Government. Accordingly, you may not, in any calendar year, receive outside earned income which exceeds 15 percent of the annual rate of basic pay for level II of the Executive Schedule. 5 C.F.R. § 2636.304. The amount for 2017 is \$27,765.00.

Additionally, as a covered noncareer employee, you are prohibited from receiving compensation for practicing a profession which involves a fiduciary relationship; or affiliating with or being employed to perform professional duties by a firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship; or permit your name to be used by any firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship. 5 C.F.R. § 2636.305. You are also prohibited from receiving compensation for serving as an officer or member of the board of any association, corporation, or other entity. 5 C.F.R. § 2636.306. Please note that this regulation does not prohibit uncompensated service with any entity as an officer or member of the board.

Lastly, you are reminded that should you choose to engage in teaching for compensation, you must be authorized in advance by a designated agency ethics official before engaging in this activity. 5 C.F.R. § 2636.307.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics

Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. § 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year, unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Should a matter come before you that may affect a person or entity you have a covered relationship with, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in any outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

Filers are required to report their transactions of stock, bonds, and commodities futures which exceed \$1,000 as well as those of their spouse and minor children. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted report reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Shana Vinson at (202) 501-9103 or the Ethics Law Staff at (202) 501-0765.

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Office of General Counsel

JUL 14 2017

MEMORANDUM FOR WILLIAM PETTIGREW
SENIOR ADVISOR
OFFICE OF SMALL BUSINESS UTILIZATION (E)

FROM: (b)(6)
EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position as Senior Communications Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated July 7, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor and promptly refrain from participating in the matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

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www.gsa.gov

substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. According to your report, your former employer is the Philadelphia Parking Authority. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Attached to this memorandum is your recusal notification for review and signature. Please sign and submit a copy to your supervisor, Mr. Charles Manger, Associate Administrator for Small Business Utilization, as well as the parties cc'd on the document.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with the Philadelphia Parking Authority in June 2017. Under the impartiality regulation, 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect the Philadelphia

Parking Authority until or about June 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until June 12, 2019. Should a matter come before you that may affect the Philadelphia Parking Authority, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

Attachment

cc: Associate Administrator for Small Business Utilization

RESTRICTED DISTRIBUTION -- FOR ADDRESSEE'S EYES ONLY



JUL 27 2017

Office of General Counsel

MEMORANDUM FOR CHARLES MANGER
ASSOCIATE ADMINISTRATOR FOR
SMALL BUSINESS UTILIZATION (E)

FROM: WILLIAM PETTIGREW
SENIOR ADVISOR
OFFICE OF SMALL BUSINESS UTILIZATION (E)

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 12, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, the Philadelphia Parking Authority.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

(b)(6)



MEMORANDUM FOR JEFFREY POST
POLICY ADVISOR
OFFICE OF CONGRESSIONAL AND
INTERGOVERNMENTAL AFFAIRS (S)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated May 9, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor and promptly refrain from participating in the matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. §§ 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year, unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Should a matter come before you that may affect a person or entity you have a covered relationship with, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform “official duties.” You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's, and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

cc: Jack St. John, Chief of Staff

RESTRICTED DISTRIBUTION -- FOR ADDRESSEE'S EYES ONLY



JUN 7 2017

MEMORANDUM FOR ROBERT SINNERS
SPECIAL ASSISTANT
OFFICE OF THE REGIONAL
ADMINISTRATOR (WA)

(b)(6)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Special Assistant to the Regional Administrator, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated May 10, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organizations in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock or retirement plans you hold, or any of your other financial interests, you must notify your supervisor promptly and recuse yourself from participation in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. A list of your former employers and clients is contained in your recusal, found at Attachment 1. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. § 203 and 205. Section 203, precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with McBride Real Estate in March of 2017. Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with

whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect McBride Real Estate until March, 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until March, 2019. Should a matter come before you that may affect McBride Real Estate, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702. You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official



FILE COPY

Office of General Counsel

MAY 25 2017

MEMORANDUM FOR ANDREW SMITH
SENIOR ADVISOR
OFFICE OF CHIEF COUNSEL (AC)

(b)(6)

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of Public Financial Disclosure Report
(OGE Form 278e) – Transferee

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor, file a Public Financial Disclosure Report. As a transferee in an OGE Form 278e filing position from the Department of Treasury ("Treasury") you submitted a copy of your 2017 report, originally filed with Treasury, to GSA for review. Your Public Financial Disclosure Report dated February 6, 2017 has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the general cautionary guidance below.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiation for employment. If a matter comes before you that could affect the financial interests of your assets, you must promptly notify your supervisor and refrain from participating in the matter until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Impartiality in the Performance of Your Official Duties

Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year, unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Should a matter come before you that may affect a person or entity you have a covered relationship with, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30

days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's, and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Shana Vinson at (202) 501-9103 or the Ethics Law Staff at (202) 501-0765.

RESTRICTED DISTRIBUTION -- FOR ADDRESSEE'S EYES ONLY



MEMORANDUM FOR MICHAEL SOLOMON

SENIOR ADVISOR

OFFICE OF THE CHIEF OF STAFF (AC) EUGENIA
ELLISON

FROM: EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

Digitally signed by EUGENIA ELLI
DN: c=US, o=U.S. Government, o
Services Administration, cn=EUG
ELLISON,
0.9.2342.19200300.100.1.1=470C
Date: 2017.03.17 13:18:05 -04'00

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated January 31, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold (like Apple and Twitter), or any of your other financial interests, you must notify your supervisor promptly and recuse yourself from participation in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and

substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. According to your report, your former employers were Omega Advisors, Inc. and Credit Suisse Group AG. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

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As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with Omega Advisors, Inc. in January 2017. Under the Impartiality regulation, 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect Omega Advisors, Inc. until or about January 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until January 20, 2019. Should a matter come before you that may affect Omega Advisors, Inc., you must notify your supervisor promptly and refrain from any

participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30

days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use [Integrity.gov](https://www.integrity.gov) for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into [Integrity.gov](https://www.integrity.gov).

If you have any questions, please contact Debra Zusin at (202) 501-0757 or the Ethics Law Staff at (202) 501-0765.

CC: Emily Murphy (AC)

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Office of General Counsel

MEMORANDUM FOR JACK ST. JOHN
SENIOR WHITE HOUSE ADVISOR
OFFICE OF THE CHIEF OF STAFF (AC)

FROM: MICHAEL SOLOMON
SENIOR ADVISOR (AC)
OFFICE OF THE ADMINISTRATOR

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of January 20, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, Omega Advisors, Inc.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, I recommend that all matters involving the above entitled companies that would normally come before me be referred to Emily Murphy, White House Liaison, unless you object. Ms. Murphy will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Emily Murphy, White House Liaison;
Ethics Law Staff

(b)(6)

Michael Solomon
3/24/2017

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405
www.gsa.gov



MEMORANDUM FOR JACK ST. JOHN

SENIOR WHITE HOUSE ADVISOR
OFFICE OF THE CHIEF OF STAFF (AC)

FROM: EUGENIA D. ELLISON ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

Digitally signed by EUGENIA ELLISON
DN: cn=EUGENIA ELLISON, ou=General
Services Administration, email=EUGENIA.ELLISON@GSA.GOV
Date: 2017.02.24 16:18:21 -0700

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior White House Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated February 14, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Attached to this memorandum is your recusal notification for review and signature. Please sign and submit a copy to Mr. Horne, as well as the parties cc'd on the document.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organizations in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor promptly and recuse yourself from participation in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Outside Earned Income Limitations

As a covered noncareer employee you are subject to the outside earned income limitations and employment and affiliation restrictions. 5 C.F.R. 2636.300 et seq. *Outside earned income* and *compensation* both mean wages, salaries, honoraria, commissions, professional fees and any other form of compensation for services other than salary, benefits and allowances paid by the United States Government. Accordingly, you may not, in any calendar year, receive outside earned income which exceeds 15 percent of the annual rate of basic pay for level II of the Executive Schedule. 5 C.F.R. § 2636.304. The amount for 2017 is \$27,765.00.

Additionally, as a covered noncareer employee, you are prohibited from receiving compensation for practicing a profession which involves a fiduciary relationship; or affiliating with or being employed to perform professional duties by a firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship; or permit your name to be used by any firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship. 5 C.F.R. § 2636.305. You are also prohibited from receiving compensation for serving as an officer or member of the board of any association, corporation, or other entity. 5 C.F.R. § 2636.306. Please note that this regulation does not prohibit uncompensated service with any entity as an officer or member of the board.

Lastly, you are reminded that should you choose to engage in teaching for compensation, you must be authorized in advance by a designated agency ethics official before engaging in this activity. 5 C.F.R. § 2636.307.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. A list of your former employers and clients is contained in your recusal, found at Attachment 1. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203, precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with St. John & St. John, LLC in January of 2017. Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect St. John & St. John LLC until January 20, 2018; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until January 20, 2019. Should a matter come before you that may affect St. John & St. John LLC, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may

not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702. You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may

choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use [Integrity.gov](https://www.integrity.gov) for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into [Integrity.gov](https://www.integrity.gov).

If you have any questions, please contact Shana Vinson at (202) 501-9103 or the Ethics Law Staff at (202) 501-0765.

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Office of General Counsel

MEMORANDUM FOR THOMAS STONER
SENIOR ADVISOR
OFFICE OF THE ADMINISTRATOR (A)

EUGENIA

FROM: EUGENIA D. ELLISON ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

Digitally signed by EUGENIA ELLISON
DN: cn=EUGENIA ELLISON, o=U.S. General Services Administration, email=EUGENIA.ELLISON@GSA.GOV
Date: 2017.01.10 11:11:16 -0500

SUBJECT: Review of New Entrant Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Senior Advisor, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated January 31, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organization in which you are negotiating for employment. A review of your New Entrant OGE Form 278e report revealed that you have a financial interest in the CLS Group, LLC. This means that if a matter comes before you that would affect the financial interests of this company, or any of your other financial interests, you must notify your supervisor promptly and recuse yourself from participation in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under

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1800 F Street, NW
Washington, DC 20405
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paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. 203 and 205. Section 203 precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with the Pennsylvania Republican Committee in October 2016. Under the impartiality regulation, 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect the Pennsylvania Republican Committee until or about October 2017; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until January 20, 2019. Should a matter come before you that may affect the Pennsylvania Republican

Committee, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that while engaging in your outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5 C.F.R. § 2635.702(a). You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report,

similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

cc: Jack St. John, Senior White House Advisor

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MEMORANDUM FOR JACK ST. JOHN
SENIOR WHITE HOUSE ADVISOR
OFFICE OF THE CHIEF OF STAFF (AC)

FROM: THOMAS STONER
SENIOR ADVISOR (A)
OFFICE OF THE ADMINISTRATOR

SUBJECT: Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of January 20, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employer, the CLS Group, LLC.

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, I recommend that all matters involving the above entitled companies that would normally come before me be referred to Emily Murphy, White House Liaison, unless you object. Ms. Murphy will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Emily Murphy, White House Liaison;
Ethics Law Staff



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Office of General Counsel

SEP 8 2017

MEMORANDUM FOR ALAN THOMAS
COMMISSIONER, FEDERAL ACQUISITION
SERVICE (Q)

FROM: (b)(6)
EUGENIA D. ELLISON
ASSOCIATE GENERAL COUNSEL / ALTERNATE
DESIGNATED AGENCY ETHICS OFFICIAL (LG)

SUBJECT: Review of Public Financial Disclosure Report
(OGE Form 278e)

The Ethics in Government Act of 1978, as amended, requires that you, due to your position, as Commissioner, Federal Acquisition Service, file a Public Financial Disclosure Report. Your Public Financial Disclosure Report dated July 15, 2017, has been reviewed by me, the Alternate Designated Agency Ethics Official. Your report did not reveal any real or apparent conflicts of interest between your financial interests and official duties. However, please note the cautionary guidance below, specific to the content of your report.

Financial Conflicts of Interest

The financial conflict of interest law at 18 U.S.C. § 208 prohibits you from working on particular matters for the government if that matter would have a direct and predictable effect on your financial interests, including financial interests imputed to you. This law imputes to you the financial interests of a spouse, minor child, and any organization you serve as an officer, director, trustee, general partner, employee, or organizations in which you are negotiating for employment. This means that if a matter comes before you that would affect the financial interests of the companies whose stock you hold, or any of your other financial interests, you must notify your supervisor promptly and refrain from participating in that matter until a determination is made on how to proceed. Such a determination should be made only after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Outside Earned Income Limitations

As a covered noncareer employee you are subject to the outside earned income limitations and employment and affiliation restrictions. 5 C.F.R. § 2636.300 et seq. *Outside earned income* and *compensation* both mean wages, salaries, honoraria, commissions, professional fees and any other form of compensation for services other than salary, benefits and allowances paid by the United States Government. Accordingly, you may not, in any calendar year, receive outside earned income which

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Washington, DC 20405

exceeds 15 percent of the annual rate of basic pay for level II of the Executive Schedule. 5 C.F.R. § 2636.304. The amount for 2017 is \$27,765.00.

Additionally, as a covered noncareer employee, you are prohibited from receiving compensation for practicing a profession which involves a fiduciary relationship; or affiliating with or being employed to perform professional duties by a firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship; or permit your name to be used by any firm, partnership, association, corporation, or other entity which provides professional services involving a fiduciary relationship. 5 C.F.R. § 2636.305. You are also prohibited from receiving compensation for serving as an officer or member of the board of any association, corporation, or other entity. 5 C.F.R. § 2636.306. Please note that this regulation does not prohibit uncompensated service with any entity as an officer or member of the board.

Lastly, you are reminded that should you choose to engage in teaching for compensation, you must receive advance authorization. 5 C.F.R. § 2636.307.

The Ethics Pledge Limitation and Covered Relationships Limitation

In addition to the restrictions discussed above, as an appointee you are bound by the requirements and restrictions in the Ethics Pledge you have signed, as required by section 1 of this Executive Order 13770 entitled "Ethics Commitments by Executive Branch Appointees," dated January 20, 2017. Of particular note is the restriction under paragraph 6 of the Ethics Pledge which precludes you from participating personally and substantially in any particular matter involving specific parties that is directly and substantially related to your former employer and clients (including regulations and contracts) for a period of two years from the date of your appointment. The Ethics Pledge defines a former employer as any person for whom you served as an employee, officer, director, trustee or general partner during the two years prior to your appointment. The Ethics Pledge defines a former client as any person for whom you served personally as agent, attorney, or consultant within the two years prior to the date of your appointment. A list of your former employers and clients is contained in your recusal, found at Attachment 1. Pursuant to the Ethics Pledge, you must not participate personally and substantially in any particular matter that is directly and substantially related to your former employers or former clients. Your recusal under the Ethics Pledge will remain in effect for two years from the date of your appointment.

Actions that may constitute personal and substantial participation include assigning covered matters on an ad hoc basis. Participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of a matter is considered personal and substantial participation.

Representational Restrictions

As a federal employee, you are also subject to the limitations under 18 U.S.C. §§ 203 and 205. Section 203, precludes you from receiving or agreeing to receive, or solicit compensation for representational services rendered by you or another, during your Government employment, on matters in which the United States is a party or has a direct and substantial interest. Section 205 precludes you from personally representing another person, with or without compensation, before any department, agency, officer or court on matters in which the United States is a party or has a direct and substantial interest. Please note, however, that these statutes do not limit your ability to represent another person before Congress, and state or local governments.

Impartiality in the Performance of Your Official Duties

Lastly, I note that you terminated employment with Artlin Consulting in June 2017 and with Berico Technologies in December 2016. Under the Impartiality in the Performance of Official Duties regulation 5 C.F.R. § 2635.502(a), an employee should not work on matters which can affect someone with whom an employee has a covered relationship, such as a former employer, within the last year. Therefore, this restriction precludes you from working on any matters that may affect Artlin Consulting until June 2018 and Berico Technologies until December 2017; unless, an authorization is granted in accordance with 5 C.F.R. § 2635.502(d). Please note, as stated above, that the Ethics Pledge prohibits your participation on matters that could affect your former employer for two years. Therefore, this prohibition is effective until June 26, 2019. Should a matter come before you that may affect Artlin Consulting or Berico Technologies, you must notify your supervisor promptly and refrain from any participation until a determination is made on how to proceed, after consultation with a Deputy Standards of Conduct Counselor or the Ethics Law Staff.

Misuse of Position

Use of Title, Position, or Authority

Although you do not have any outside employment or activities listed, please note that should you choose to engage in outside employment or outside activities in your personal capacity, you may not use or permit the use of your official title and position with GSA to identify you in connection with the activity. (5 C.F.R. § 2635.807(b)). Further, you may not use your public office for your own private gain, for the endorsement of any product, service or enterprise, for the private gain of friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity, including nonprofit organizations, or persons with whom you have or seek employment or business relations. 5 C.F.R. § 2635.702. You may not use or permit the use of your position or title in a matter that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise to yourself, friends, relatives, or persons of whom you are affiliated with in a nongovernmental capacity. 5

C.F.R. § 2635.702. You may not, use or permit the use of your Government position or title or any authority associated with your public office in a matter that could reasonably be construed to imply that GSA or the Government sanctions or endorses your personal activities. See 5 C.F.R. § 2635.702(b). However, if you engage in teaching, speaking, or writing as outside employment or as an outside activity you may include or permit the inclusion of your title or position as one of several biographical duties when such information is given to identify you in connection with your teaching, speaking and writing, provided that your title or position is not given more prominence than other significant biographical details. 5 C.F.R. § 2635.807(b).

Use of Government Equipment

Federal employees have an obligation to use Government equipment and official time in an honest effort to perform "official duties." You must use your own equipment and time for your outside employment and outside activities. You may not use any government equipment, such as your computer, telephone, or e-mail, for conducting outside employment activities, unless otherwise allowed by GSA Order ADM 7800.11A, *Personal Use of Agency Office Equipment*. You must take annual leave to conduct this activity if the activity takes place during your duty hours, since you cannot use official time to engage in outside employment activities. You do not have to take annual leave if this activity falls outside of your official hours of work.

Periodic Transaction Reports

Section 6 of the Stop Trading on Congressional Knowledge Act of 2012 (STOCK Act) requires Public Financial Disclosure Report filers to file a Periodic Transaction Report, similar to the Transaction part of the Public Financial Disclosure Report, within 30 days of receiving notification of a transaction, but no more than 45 days from the date of the actual transaction.

You, your spouse's and minor children's transactions of stock, bonds, and commodities futures which exceed \$1,000 must be reported on the periodic transaction reports. Transactions of real property, excepted investment funds (such as mutual funds), treasuries, life insurance and annuities, cash accounts, and assets contained in a retirement system maintained by the United States, such as the Thrift Savings Plan (TSP), which exceed \$1,000 are not required to be reported on a Periodic Transaction Report. However, please note that although these transactions are not required to be reported on a Periodic Transaction Report, many of them are required to be reported on your annual and termination Public Financial Disclosure Report. Therefore, you may choose to report excepted investment fund transactions and other exempted report reportable transactions on a Periodic Transaction Report.

All filers are required to use Integrity.gov for reporting periodic transaction. Please note that you are not required to submit a negative report if you have no reportable transactions.

As an Integrity electronic filer, a copy of your report can be obtained anytime simply by logging into Integrity.gov.

If you have any questions, please contact Crystal Nieves at (202) 357-9568 or the Ethics Law Staff at (202) 501-0765.

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Office of General Counsel

MEMORANDUM FOR TIM HORNE

**ACTING ADMINISTRATOR (A)
OFFICE OF THE ADMINISTRATOR**

FROM:

**ALAN THOMAS
COMMISSIONER, FEDERAL ACQUISITION
SERVICE (Q)**

(b)(6)

SUBJECT:

Recusal Notification

As required by paragraph 6 of the Ethics Pledge, I will not, for a period of two years from the date of my appointment of June 26, 2017, participate personally and substantially in any particular matter involving specific parties that is directly and substantially related to my former employers, Artlin Consulting, Berico Technologies, and ASRC Federal (formerly Data Networks Corporation).

Actions that may constitute personal and substantial participation include assigning matters on an ad hoc basis; participating in a decision concerning who should work on a matter, how a matter should be handled, or whether a matter should be acted upon, are all forms of personal and substantial participation in the matter. Involvement in preliminary discussions, in interim evaluations, in review or approval at intermediate levels, or in supervision of subordinates working on a matter also amount to personal and substantial participation. In addition, a discussion with affected persons about the merits or progress of the matter is considered personal and substantial participation.

To ensure that I do not inadvertently participate officially in such matters involving the companies identified above, please identify who should handle matters involving the above entitled companies that would normally come before me. This person will handle all matters involving the above entitled companies and advise all interested parties of the recusal.

cc: Ethics Law Staff

U.S. General Services Administration
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Washington, DC 20405
www.gsa.gov